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June 17, 2025

**VIA ECF**

Hon. Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Charlie Javice and Olivier Amar, 23 Cr. 251 (AKH)

Dear Judge Hellerstein:

Defendant Charlie Javice respectfully requests a two-week extension of time to submit objections to the Initial Disclosure Presentence Report to the U.S. Probation Office.

Ms. Javice's sentencing is currently scheduled for August 26, 2025. Probation submitted the Initial Disclosure to the parties and the Court on June 5, 2025. Objections are currently due to Probation on June 20, 2025. Ms. Javice requests that the Court extend the deadline to submit objections by two weeks, to July 7, 2025.<sup>1</sup> A limited two-week extension will allow Ms. Javice's counsel to continue to review the over forty pages of initial disclosures with Ms. Javice and evaluate possible objections. Even with a two-week extension, Ms. Javice would submit objections nearly eight weeks in advance of her sentencing date.

United States Probation Officer Ashley Geiser does not oppose a two-week continuance.<sup>2</sup> Counsel for the government does not oppose the motion.

*[Intentionally left blank.]*

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<sup>1</sup> A two-week extension would make objections due on July 4, 2025. Because July 4<sup>th</sup> is a federal holiday, in accordance with Local Criminal Rule 45.1, Ms. Javice's objections would be due on July 7, 2025.

<sup>2</sup> Officer Geiser will be on annual leave July 1 through July 22, 2025.

Respectfully submitted,

/s/ Kirsten R. Nelson

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